

July 29, 2019

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VIA ECFS

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: *Misuse of Internet Protocol (IP) Captioned Telephone Service, CG Docket No. 13-24***  
***Structure and Practices of the Video Relay Service Program, CG Docket No. 10-51***  
***Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket No. 03-123***

Dear Ms. Dortch:

Pursuant to the Third Protective Order issued in the above-captioned proceedings, please find the attached executed Acknowledgment of Confidentiality for Alison Stein, counsel to CaptionCall, LLC, and Greg Rosston, Outside Consultant to CaptionCall, LLC and Jenner & Block LLP.

Sincerely,

/s/ Elliot S. Tarloff

Elliot S. Tarloff  
Counsel to CaptionCall, LLC

Attachments

APPENDIX C

Acknowledgment of Confidentiality

CG Docket Nos. 13-24, 10-51, and 03-123

I am seeking access to ☐ only Confidential Information or ☒ Confidential Information and Highly Confidential Information.

\*14 I hereby acknowledge that I have received and read a copy of the foregoing Protective Order in the above-captioned proceeding, and I understand it.

I agree that I am bound by the Protective Order and that I shall not disclose or use Stamped Confidential Documents or Stamped Highly Confidential Documents or Confidential Information or Highly Confidential Information except as allowed by the Protective Order.

I acknowledge that a violation of the Protective Order is a violation of an order of the Federal Communications Commission (Commission). I further acknowledge that the Commission retains its full authority to fashion appropriate sanctions for violations of this Protective Order, including but not limited to suspension or disbarment of Counsel or Consultants from practice before the Commission, forfeitures, cease and desist orders, and denial of further access to Confidential Information or Highly Confidential Information in this or any other Commission proceeding.

I acknowledge that nothing in the Protective Order limits any other rights and remedies available to a Submitting Party or Third-Party Interest Holder at law or in equity against me if I use Confidential Information or Highly Confidential Information in a manner not authorized by this Protective Order.

I certify that I am not involved in Competitive Decision-Making.

Without limiting the foregoing, to the extent that I have any employment, affiliation, or role with any person or entity other than a conventional private law firm (such as, but not limited to, a lobbying or advocacy organization), I acknowledge specifically that my access to any information obtained as a result of the Protective Order is due solely to my capacity as Counsel or Outside Consultant to a party or as an employee of Counsel, Outside Consultant, or Outside Firm, and I agree that I will not use such information in any other capacity.

I acknowledge that it is my obligation to ensure that Stamped Confidential Documents and Stamped Highly Confidential Documents are not duplicated except as specifically permitted by the terms of the Protective Order and to ensure that there is no disclosure of Confidential Information or Highly Confidential Information in my possession, in the possession of those who work for me or in the possession of other Support Personnel, except as provided in the Protective Order.

I certify that I have verified that there are in place procedures at my firm or office to prevent unauthorized disclosure of Confidential Information and Highly Confidential Information.

Capitalized terms used herein and not otherwise defined shall have the meanings ascribed to them in the Protective Order.

Executed this 2nd day of July, 2019

Alison Stein

[Name]

Alison Stein

[Position] *Partner*[Firm] *Jenner + Block LLP*[Telephone] *212-891-1622*

## Footnotes

- 1 *See, e.g.*, 47 CFR § 64.606(g) (requiring Internet-based TRS providers to submit annual reports demonstrating compliance with section 64.604).
- 2 *See* Rolka Loube Associates LLC, Interstate Telecommunications Relay Services Fund Payment Formula and Fund Size Estimate, CG Docket Nos. 03-123 and 10-51 (filed May 4, 2018) (2018 TRS Rate Filing).
- 3 Letter from David Rolka, President, Rolka Loube Associates, LLC, to Marlene H. Dortch, Secretary, FCC, CG Docket Nos. 03-123 and 10-51 at 1 (filed May 4, 2018) (requesting confidential treatment of Exhibit 1-3.1 of the 2018 TRS Rate Filing). The TRS Fund administrator subsequently submitted a revised Exhibit 1-3 and a request for confidential treatment of revised Exhibit 1-3.1 of the 2018 TRS Rate Filing. *See* Letter from David Rolka, President, Rolka Loube Associates, LLC, to Marlene H. Dortch, Secretary, FCC, CG Docket Nos. 03-123 and 10-51, at 1 (filed May 25, 2018).
- 4 *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; Individual IP CTS Provider Cost and Demand Data to be Placed in the Record Subject to Second Protective Order*, Public Notice, DA 18-495, at 1 (May 14, 2018) (*Confidential Data Public Notice*); *see also* *Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Second Protective Order, 27 FCC Rcd 5914 (CGB 2012) (*Second Protective Order*).
- 5 Opposition of Hamilton Relay, Inc., CG Docket Nos. 03-123 and 10-51, at 2, 4-5 (filed May 24, 2018) (Hamilton Opposition).
- 6 *Id.* at 2, 4-6.
- 7 *See, e.g.*, *Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Protective Order, 27 FCC Rcd 2557 (CGB 2012) (*First Protective Order*); *Second Protective Order*, 27 FCC Rcd 5914.
- 8 47 U.S.C. § 154(j).
- 9 *Infra* Appx. A, Third Protective Order, at paras. 1, 3-7, 11, 18-19.
- 10 *Id.* at para. 1.
- 11 Compare Appx. A with *Second Protective Order*, 27 FCC Rcd 5914.
- 12 *See infra* Appx. C, Acknowledgment of Confidentiality.
- 13 *See* Hamilton Opposition at 5-6 (requesting application of the copying restriction in the *Second Protective Order*).
- 14 Appx. A at para. 5.
- 15 *Id.*
- 16 *Id.*
- 17 *Id.* at para. 7.
- 1 47 CFR §§ 0.459, 0.461.
- 2 *Id.* § 0.459(a).
- 3 *Cf. id.* §§ 0.459(g), 0.461(i).
- 4 *See id.* §§ 0.459(h), 0.461.
- 5 If a party is not able to submit a copy of the Redacted Confidential Document or Redacted Highly Confidential Document via ECFS, it must file two copies of the Redacted Confidential Document or Redacted Highly Confidential Document with the Secretary's Office along with the appropriately stamped cover letter.
- 6 This paragraph describes the procedure for objecting to a specific individual being permitted to review Confidential Information and Highly Confidential Information pursuant to this Protective Order. If a party timely requests that certain information be entirely withheld from review by *any* individual under the Protective Order, we will not require that the information at issue be disclosed under the Protective Order until the Commission resolves the objection, and if a timely motion for judicial stay is filed, until the court rules upon the stay motion.
- 7 An objection ordinarily will first be ruled upon by the Consumer and Governmental Affairs Bureau. If the Bureau rejects the objection, the objecting party will be provided 10 business days to file an Application for Review with the Commission; if an

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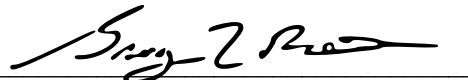
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Executed this 29th day of July, 2019.



[Name]	Gregory L. Rosston
[Position]	Economist
[Firm]	
[Telephone]	650-566-9211